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November [INSERT DATE], 2017

Laura Duchnak, Director
Base Realignment and Closure Program Management Office
U.S. Department of Navy
33000 Nixie Way
San Diego CA 92147

Dear Ms. Duchnak:

The U.S. Environmental Protection Agency (USEPA) and the State Department of Toxic Substances Control (DTSC), working with the California Department of Public Health (CDPH), expedited review of the Navy's Hunters Point Naval Shipyard radiological data evaluation Findings Reports for Parcels B and G. The Navy, USEPA, DTSC, and CDPH together found signs of potential falsification and/or data quality problems in radiological work conducted by Tetra Tech EC, Inc., in 86% of soil survey units for Parcel B and 97% of the same in Parcel G. Furthermore, in the Findings Reports recently submitted for Parcels C, D-2, UC-1, UC-2, and UC-3, prior to regulatory agencies' review, the Navy has recommended resampling in over 60% of soil survey units. Signs of data manipulation and/or falsification were found in 78% of fill units in Parcel C. The overall level of potential falsification and/or data quality problems is shocking, greater than any of us could have imagined, and seriously compromises the integrity of the radiological cleanup.

For these reasons, the next phase of the radiological reevaluation – the field sampling effort – is critically important and will require a significant level of effort. As you know, under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Navy is the lead agency responsible for cleaning up Hunters Point, with USEPA and DTSC, working with CDPH, in oversight roles. Collectively, we need to demonstrate, consistent with each Parcel's Record of Decision (ROD) and as required by Section 120(h)(3) of CERCLA, that "all remedial action necessary to protect human health and the environment ... has been taken before the date of [any] transfer" of property.

The regulatory agencies have made the reasonable suggestion that the Navy start with new sampling and analysis at a subset of the Parcel G trench units to test with new, verifiable data the

Conceptual Site Model that is the basis for the ROD requirements. We believe that the Parcel G resampling results will help guide the resampling approach for the remaining parcels.

We look forward to working with the Navy to complete this comprehensive resampling effort and get the property into productive reuse as soon as possible. The cost and delay now will give the necessary assurance to the local community, the Navy, the regulatory agencies, elected officials, and investors that the site is safe for the intended reuse.

Sincerely,

Enrique Manzanilla
Director
Superfund Division
U.S. Environmental
Protection Agency, Region 9

Mohsen Nazemi
Deputy Director
Brownfields and Environmental
Restoration Program
California Department of Toxic
Substances Control

Anthony Chu
Chief
Division of Radiation Safety
and Environmental
Management
California Department of
Public Health

cc: Lawrence Lansdale and Kimberly Ostrowski, Navy
Barbara Garcia, City of San Francisco Department of Public Health
Terry Seward, Regional Water Quality Control Board
Ray LeClerc, DTSC